From: Khan, Faruque

To: <u>Scott H Jackson</u>; <u>Ellenberger</u>, Jay; <u>Peck</u>, <u>Charles</u>

Cc: Corbin, Mark

Subject: RE: Adjuvant testing with DRT

Date: Tuesday, October 21, 2014 11:45:00 AM

Hi Scott.

For the Enlist product, the buffer was determined explicitly based on a specific formulation and nozzle combination. In such a case, the Agency cannot assume that, in presence of additional tank mixes, the nozzle will generate a similar spray quality as it did for the Enlist formulation alone. Currently EPA is asking the registrant to provide spray quality data using typical tank mixes applied with 2,4-D and the specific nozzle that was used in determining the buffer distance. The test results will provide EPA with a relative spray quality in which we can model depositions for tank mixes and the Enlist formulation, in order to assess the relative impact on the buffer distance resulting from the Enlist formulation alone. Since the buffer was based on a nozzle outside the list of ASABE reference nozzles specified in the DRT program, there was no DRT component in the Enlist evaluation. Questions related to glyphosate/dicamba should be deferred to the dicamba team.

Thanks!

Faruque

From: Scott H Jackson [mailto:scott.jackson@basf.com]

Sent: Monday, October 20, 2014 10:59 AM

To: Ellenberger, Jay; Peck, Charles; Khan, Faruque

Subject: Adjuvant testing with DRT

Dear All,

As we approach the registration of the dicamba use in DT crops , for the purposes of DRT testing, can we test adjuvant categories or must we test every specific brand name product that we would want to go into the tank? This comment arises from what we observed with the recent registration of Dow's Enlist product.

Additionally the same question for glyphosate products: can we test representative loaded and unloaded (with and without surfactants) products to cover the commercially available offerings?

Thanks in advance,

Scott

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